

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

BRIAN GILBERT,

Defendant

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CRIMINAL NO. PWG-20-374

PROTECTIVE ORDER

Now before the Court is the Government's Consent Motion for a Protective Order Regulating Discovery Materials. Having considered the motion, and for good cause shown, the Court hereby GRANTS the motion and enters the following PROTECTIVE ORDER in this case, pursuant to Federal Rule of Criminal Procedure 16(d):

1. This Protective Order governs all discovery material in any format (written or electronic), and information contained therein, that is produced by the Government in discovery in the above-captioned case (hereafter referred to as "discovery material").
2. The United States will make available copies of the discovery materials, including those filed under seal, to defense counsel to comply with the Government's discovery obligations.
3. Any discovery material, or information contained therein, which references the names of the websites and/or the underlying investigative techniques that led to the identification of the Defendant, shall not be disseminated to anyone other than defense counsel and other members of the Defendant's litigation and investigative team and, if filed, shall be filed under seal and shall remain sealed unless and until otherwise ordered by this Court.

4. None of the provisions in this Protective Order entitle either party to seal their filings as a matter of course. The parties are required to comply in all respects with the relevant local and federal rules of criminal procedure pertaining to the sealing of court documents, as well as with 18 U.S.C. §§ 3509 and 3771.
5. None of the provisions in this Protective Order preclude defense counsel from reviewing the discovery material with the Defendant, so long as the Defendant is first notified by defense counsel of the terms of this Protective Order and counsel does not provide a copy of the discovery material to the Defendant to keep and maintain in his possession.

SO ORDERED this ____ day of December, 2020.

HONORABLE PAUL W. GRIMM
UNITED STATES DISTRICT JUDGE